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December 11, 2017

Ms. Marlene S. Dortch Secretary Federal Communications Commission 445 12th Street S.W. Room 2-B450 Washington, DC 20554

Re:

Ex Parte Filing RM - 11793

Dear Ms. Dortch:

This is to provide an update on discussions between aeronautical mobile telemetry ("AMT") representatives, the Federal Aviation Administration, and representatives of the WiMax Forum regarding compatibility tests between AMT and AeroMACS.

On November 21, the undersigned, together with Messrs. David Silver, Vice-President, Civil Aviation, Aerospace Industries Association; Joseph Cramer, Regional Director, The Boeing Company; Ryan Terry, Director, Regulatory Licensing and Policy, Trade & Regulatory Affairs, Lockheed Martin Corporation; and Chip Yorkgitis, Kelley Drye & Warren LLP, counsel for Raytheon Company, met with David Spencer, Director, Operations Support, AJW-1, Technical Operations, Air Traffic Organization, Federal Aviation Administration; Ian Atkins, Director, Technical Operations Services, FAA Spectrum Engineering and Policy; and Michael Biggs, Senior Engineer, FAA Spectrum Engineering Services.

The purpose of the meeting was to discuss a process for refining techniques which may enhance compatibility between AMT and AeroMACS at the few airports that happen to be colocated with aerospace manufacturing plants. To that end, the AMT representatives presented a draft test plan for consideration by the FAA. The parties agreed to study the issue together, such study to include modeling and field tests looking toward determining the referenced techniques.

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On December 5, an expanded team of AMT representatives including technical experts from AMT equipment vendors, held a conference call with FAA representatives, as well as representatives from the WiMax Forum and AeroMACS interests. The group discussed an interference prediction model utilized by the WiMax Forum, its application to AMT-AeroMACS compatibility, and field tests.

The AMT parties intend to expeditiously complete modeling analysis and field tests, and have made an offer regarding same to the FAA and WiMAX; the parties have agreed to a date for a small technical group to discuss the modeling (December 19). While differences with the Forum have surfaced, we look forward to continuing our efforts toward cooperation with its representatives, and with the FAA. These efforts will include the development of methods by which the parties can collaborate on system deployments that maximize use of the spectrum without harmful interference to AeroMACS. On other points, the AMT position remains as stated in the prior filings of the Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC"), and its Member Companies; this includes the importance of factoring the results of the forthcoming tests into any service rules the Commission might propose for AeroMACS.

Any questions regarding this filing may be directed to the undersigned.

Respectfully submitted,

William K. Keane
Counsel for AFTRCC

cc: Michael Biggs
Sean Conway
Rachel Bender
Kevin Holmes
Tim Maguire
Ronald Repasi
Aalok Mehta
Scot Stone